

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MUHAMMAD ANWAR,

Plaintiff,

-against-

CHRISTOPHER STEPHENS, d/b/a 7-ELEVEN,
and ATTAULLAH KHAN, an individual,

Defendants.

Docket No.: 15-cv-4493 (JS)(GRB)

**NOTICE OF ACCEPTANCE OF
DEFENDANTS' RULE 68
OFFER JUDGMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 68 of the Federal Rules of Civil Procedure, Plaintiff MUHAMMAD ANWAR hereby accepts Defendants' Rule 68 offer of judgment, attached hereto as Exhibit A, in the amount of One Hundred Ninety-Nine Thousand Five Hundred Dollars and Zero Vents (**\$199,500.00**), inclusive of attorneys' fees and costs.

Dated: New York, New York
September 12, 2016

Respectfully submitted,

BORRELLI & ASSOCIATES, P.L.L.C.
Attorneys for Plaintiff

By:



MICHAEL R. MINKOFF (MM 4787)
ALEXANDER T. COLEMAN (AC 8151)
MICHAEL J. BORRELLI (MB 8533)

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Plaintiff,

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CHRISTOPHER STEPHENS, d/b/a 7-ELEVEN, and
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-----X

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: CV: 15-4493 (JS) (GRB)

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: **OFFER OF JUDGMENT**
:
: **PURSUANT**
:
: **TO F.R.C.P. RULE 68**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Christopher Stephens, d/b/a 7-Eleven and Attaullah Khan (collectively “defendants”) hereby offer to allow judgment to be taken against Defendants in favor of and with respect to all claims asserted by Muhammad Anwar (“Plaintiff”) in the above-captioned matter, in the amount of One Hundred Ninety Nine Thousand Five Hundred Dollars and Zero Cents (\$199,500.00), inclusive of all attorney’s fees, costs and expenses, liquidated damages, and in satisfaction of all of Plaintiff’s claims for relief in this action. This offer of judgment is intended to resolve all of Plaintiff’s claims in this action, including without limitation any and all claims for back wages, front pay, overtime pay, compensatory damages, statutory damages, liquidated damages, interest, attorneys’ fees, and costs and expenses. Plaintiff’s acceptance of this offer is in full satisfaction and settlement of all claims asserted by Plaintiff against Defendants Christopher Stephens, d/b/a 7-Eleven and Attaullah Khan.

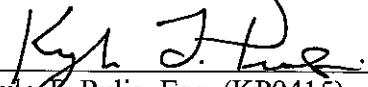
This offer of judgment is made for the purposes specified in F.R.C.P. Rule 68 only, and neither it nor any judgment resulting from this offer may be construed as either an admission that Defendants are liable for any wrongdoing in this action, or that the Plaintiff has suffered any damages or harm. This offer shall be kept confidential to the fullest extent permitted by law.

This offer shall not be filed with the Court unless accepted and shall be deemed withdrawn if it is not accepted within Fourteen (14) days of receipt by the Plaintiff.

Dated: Islandia, New York
September 7, 2016

SCOTT MICHAEL MISHKIN, P.C.

By:



Kyle J. Pulis, Esq. (KP0415)

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Islandia, New York 11749
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Attorneys for Defendants